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*Counsel for the Debtor*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 22-10165 (MG)  
: :  
: :  
: Debtor. :  
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**NOTICE OF MONTHLY FEE STATEMENT FOR DEBTOR'S SPECIAL ADVERSARY  
PROCEEDING COUNSEL  
FOR THE MONTH OF JULY 2022**

PLEASE TAKE NOTICE that pursuant to the Order of the Bankruptcy Court dated March 11, 2022 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the Monthly Fee Statement for Debtor's Special Adversary Proceeding and Conflicts Counsel for the month of July 2022 is attached hereto.

Dated: Garden City, New York  
August 12, 2022

CULLEN AND DYKMAN LLP  
*Counsel for Debtor*

By: s/ Bonnie Pollack  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
100 Quentin Roosevelt Boulevard  
Garden City, NY 11530  
(516) 357-3700

Joseph Klaynberg  
114 Mulberry Street  
New York, NY 10013

August 4, 2022

File #: 22-008

**Attention:**

**RE: Josephy Klaynberg - Chapter 11 Special Counsel**

<b>DATE</b>	<b>ENTRY # DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Jul-05-22	105079 Drafting of Interim Fee Application	0.90	450.00	AMT
Jul-07-22	105096 Drafting of First Interim Fee Application	1.60	800.00	AMT
Jul-11-22	105514 Review and analysis of proposed plan of reorganization (1.3) confer with S. Avramidis re: plan, adversary proceeding, insolvency, discovery etc.	1.60	800.00	AMT
	105148 draft email to B. Pollack; phone with B. Pollack re: pre-trial hearing, proposed plan issues	0.90	450.00	AMT
	105515 Review of Scheduling Order; draft email to Patrick Robson re: 26(f) Conference; outline discovery requirements; draft email to B. Pollack	0.30	150.00	AMT
	105153 Confer with AMT re. plan of reorganization & effects on preference action.	0.30	97.50	SA
	105154 Phonecall with AMT & Bonnie re. plan of reorganization and potential affects upon litigation of preference action.	0.80	260.00	SA
Jul-12-22	105157 Drafting of Fee Application	1.50	750.00	AMT
	105171 Review and revised fee application and exhibits, e-mail to B. Pollack	0.40	200.00	AMT
Jul-13-22	105182 Draft email to J. Klaynberg re: fee application; attend to fee application	0.50	250.00	AMT
	105191 26(f) Conference call with Nahla attorneys Robert Rich	0.20	100.00	AMT
	105192 Follow up call with S. Avramidis discovery plan	0.10	50.00	AMT
	105197 26(f) phone conference	0.20	65.00	SA

Jul-14-22	105209 Review and comment on Plan provisions as pertains to preference action; draft email to B. Pollack	0.30	150.00	AMT
	105238 Review of Disclosure Statement and Liquidation Analysis; draft email to B. Pollack with comments	1.30	650.00	AMT
	105516 Calendar hearing on interim applications.	0.20	0.00	DM
Jul-15-22	105237 Emails with B Pollack; Review of revised Liquidation analysis; Phone to B. Pollack	0.30	150.00	AMT
	105517 Phone with B. Pollack re: Disclosure Statement; make suggested changes as relates to preference action and Nahla lien status on assets	0.60	300.00	AMT
Jul-18-22	105573 Review email from B Pollack re: fee application comments, discuss with SA, Phone with B. Pollack discuss adversary proceeding pre-trial conference hearing on for tomorrow as well as Nahla motion to prosecute causes of action against Emily Klaynberg	0.60	300.00	AMT
	105266 emails to and from R. Rich re: uploading of Scheduling Order	0.10	50.00	AMT
	105574 Attend to final changes to interim fee application and certification as per B. Pollack comments	0.10	50.00	AMT
	105260 Review scheduling order; confer with AMT re. same.	0.10	32.50	SA
Jul-19-22	105276 Phonecall with AMT & Bonnie re. fee application, pretrial conference, and hearings schedules for 7/20/22.	0.70	227.50	SA
	105277 Revise fee application & certificate per comments. Phonecall with AMT & DM re. finalizing.	0.30	97.50	SA
Jul-20-22	105304 Prepare for and Court Appearance by Zoom - pre-trial on adversary proceeding	1.20	600.00	AMT
	105306 Phone with Bonnie Pollack post hearing discussion	0.20	100.00	AMT
	105337 Attend hearings. Confer with AMT re. same. Phonecall with Bonnie re. same.	1.20	0.00	SA

Jul-25-22	105401 Emails re. fee app. Phonecall with DM re. service of fee app	0.20	65.00	SA
	Totals	16.70	\$7,195.00	